

Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

May 8, 2015

MedSource International, LLC c/o Mr. Howard Cooper Principal Consultant EQACT INC.
11715 Fox Road Indianapolis, IN 46236

Re: K150333

Trade/Device Name: MedSource Sharps Dart

Regulation Number: 21 CFR 880.5570

Regulation Name: Hypodermic single lumen needle

Regulatory Class: II Product Code: MMK Dated: March 10, 2015 Received: March 12, 2015

Dear Mr. Cooper:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

of Surveillance and Biometrics/Division of Postmarket Surveillance.

Sincerely yours,

Tejashri Purohit-Sheth, M.D.

Tejashri Purohit-Sheth, M.D. Clinical Deputy Director DAGRID/ODE/CDRH FOR

Erin I. Keith, M.S.
Director
Division of Anesthesiology, General Hospital,
Respiratory, Infection Control and
Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Indications for Use

510(k) Number (if known)

K150333

Form Approved: OMB No. 0910-0120 Expiration Date: January 31, 2017 See PRA Statement below.

CONTINUE ON A SEPARA	ATE PAGE IF NEEDED.
Type of Use (Select one or both, as applicable) Prescription Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 801 Subpart C)
Type of Lice (Select one or both, as applicable)	
Diameter-3cm (1.2 in.) Empty Weight- 255 gm (0.9 oz)	
Length-17cm (6.7 in.)	
MedSource Sharps Dart Model No. MS-64250 Color-Clear/translucent with red closure	
The MedSource Sharps Dart is a non-sterile single-use dispose contaminated 1 ml or smaller syringe. Its intended use is by head containers are not accessible such as EMS, home healthcare, are user prior to disposal by incineration or decontamination by automatical statement of the statement of	alth care professionals in a setting where standard sharps and laboratories. Its permanent closure system protects the
ndications for Use (Describe)	
MedSource Sharps Dart	
Device Name	

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4201 Norex Drive Chaska, MN 55318 USA

 510 (k) Summary
SECTION 5

Date Prepared: May 8, 2015

1. General Information

Submission Sponsor		Submission Correspondent	
MedSource Internationa	I	Howard T. Cooper	
4201 Norex Drive		EQACT, INC.	
Chaska, MN 55318		11715 Fox Rd.	
		Suite 400	
		Indianapolis, IN 46236	
		317-826-4398 office	
Device I	dentification	Predicate identification	
Characteristic	Submission Device	Predicate A	Predicate B
Trade name	MedSource Sharps Dart	Covidien Sharps Shuttle	B Travel Savvy Sharps
		/Sharps Shuttle with	Container
		Locking Mechanism*	
510(K)	K150333	K972279	K140285
Regulatory Name	Hypodermic Single-	Hypodermic Single-	Hypodermic Single-
	Lumen Needle	Lumen Needle	Lumen Needle
Common name	Sharps Container	Sharps Container	Sharps Container
Product Code	MMK	FMI	MMK
Classification	Class II	Class II	Class II
CFR reference	880.5570	880.5570	880.8570
Classification Panel	General Hospital	General Hospital	General Hospital
Catalog No.	MS-64250	Model 8801	BTS-702

2. Device Description

Products

The MedSource Sharps Dart (MSD) sharps container consists of two injected molded parts-a tubular tapered cone and a polypropylene closure. Its small size of 0.6 L qualifies it as a pocket sharps container as defined by ISO 23907 First Edition 2012-09-01, Sharps injury protection-Requirements and test

<u>methods-Sharps containers.</u> It is designed for the storage, such sharps as small syringes, blood needles, lancets, and angio-caths prior to disposal consideration. It's intended to be used in remote settings for sharps containers are not convenient and accessible such as EMS, home healthcare, etc. It is a single use device.

The MSD sharps container was designed using the above standard, ISO 23907, and its design includes the required features specified in the standard. It meets the performance requirements for the standard. In addition, it has also been tested by an independent laboratory to meet the requirements for puncture resistance specified in ASTM F2132-01 (Re-approved in 2008). Both standards are FDA recognized.

The predicate device, Covidien Sharps Shuttle, was selected because of its tubular-conical configuration with a polypropylene hinge-closure, which is very similar to the construction of the MedSource Sharps Dart. They are also similar in their weight and dimensions. When comparing such factors as Indications for Use, Performance, Technology, and method of manufacture, the data shows substantial equivalence between both the Covidein Sharps Shuttle and the MedSource Sharps Dart.

Although both devices are considered to be substantially equivalent, they have been or are being cleared at different periods of regulation. At the time that the predicate device was approved, there was not an FDA recognized standard for sharps container. However, Medsource Sharps Dart was designed following FDA recognized standards for the products with respect to puncture resistance testing and leak testing.

3. Standards

The following FDA recognized standards were used in the preparation of this 510K:

Standard	Summary of Compliance to
	Standard
ISO 23907 First edition 2012-09-01-Sharps injury protection— Requirements and test methods— Sharps containers	Medsource Sharps Dart compliance to the definition of the pocket sharps container. 1. Summary report prepared demonstrating compliance to the standard for pocket sharps container 2. Testing was conducted for puncture resistance and leak
	resistance and product met the testing criteria
ASTM F2132- 01 (2008) Standard Specification for	See revised standards Summary
Puncture Resistance of Materials Used in Containers	report prepared demonstrating
for Discarded Medical Needles and Other Sharps	compliance to standard.
	See Section 18, Performance Testing

FDA OSHA	29 CFR 1910.1030	Meets requirements by compliance
		to applicable parts of ISO 23907
		(Impact Test) and
		ASTM F 2132 (Puncture Resistance)

4. Device Comparison

Predicate ID	Submission Device	Predicate A	Predicate B
Trade	MedSource Sharps Dart	Covidien Sharps	B Travel Savvy Sharps
Name	K150333	Shuttle With Locking	Container
		K972279	K140285
Indications for	The MedSource Sharps	The Sharps Shuttle	The Travel Savvy
Use	Dart is a non-sterile	and Sharp Shuttle	Sharps Container is a
	single-use disposable	with Locking	single-use device
	sharps container with a	Mechanism are	intended for disposal
	permanent closure	single use, non-	of sharps waste by a
	system for a	sterile, disposable,	single user in a
	contaminated 1ml or	sharps transport	private site of use.
	smaller syringe. Its	containers intended	When mounted with
	intended use is by health	for use in any setting	the appropriate
	care professionals in a	where standard	bracket, the Travel
	setting where standard	sharps containers are	Savvy Sharps
	sharps containers are not	not conveniently	Container can be
	accessible such as EMS,	accessible, such as	used for sharps
	home healthcare and	EMS home health	disposal in vehicles.
	laboratories. Its	care, etc	The B Travel Savvy
	permanent closure		Sharps container
	system protects the user		color is red. The
	prior to disposal by		length of the device
	incineration or		is 6.5 inches, the
	decontamination by		width is 2.1 inches
	autoclave.		and the height is 2.3
			inches. The aperture
	MedSource Sharps Dart		opening is 1.5 inches
	Model No. MS-64250		wide and the length
	Color-Clear/translucent		is 2.5 inches.
	with red closure		

RX or OTC Material Sharps Access Sharps Closure Dimensions & Weight	Length-17cm (6.7 in.) Diameter-3cm (1.2 in.) Empty Weight- 255 gm (0.9 oz) OTC Polypropylene Top opening Hinged closure Length-17cm (6.7 in.) Diameter-3cm (1.2 in.) Empty Weight- 255 gm (0.9 oz)	OTC Polypropylene Top Opening Hinged closure Approximately 6in. long & 1 in. diameter Empty weight not available	OTC Polypropylene Top Opening Hinged closure The length of the device is 6.5 inches, the width is 2.1 inches and the height is 2.3 inches. The aperture opening is 1.5 inches wide and the length is 2.5 inches.
Single use	Yes	Yes	Yes
Non-sterile	Yes	Yes	Yes
Translucent	Yes	Yes	Yes
Impact and leak resistance	Yes	Yes	Yes
Needle Penetration Resistance-	Yes	Yes	Yes

5. Comparison Results

	Category of comparison	Results
1.	Regulatory Requirements	Equivalent
	Characteristics	
2.	Indications for Use & RX/OTC	Equivalent
3.	Design & Construction and Method of	Equivalent
	Manufacture	
4.	Technology	Equivalent
5.	Product Features	Equivalent

6. Test Methods

Test Methods	Standards
Puncture Resistance	ISO 23907- Section 4.2.4
Resistance to Leakage	ISO 23907- Section 4.2.5
Puncture Resistance	ASTM- F2132-01

7. Conclusion

The MedSource Sharps Dart sharps container was compared to the above predicate devices in such areas as technology, indications for use, materials of construction, performance testing, product testing, and product features. Based on the review of this data, the data supports the conclusion that the subject device is substantially equivalent to the predicate devices. No new questions of safety or effectiveness are raised by the introduction this device. Therefore, we conclude that the subject device is as safe, as effective, and performs as well as the legally marketed predicate devices [Covidien Sharps Shuttle/ Sharps Shuttle with Locking Mechanism (K972279) and B Travel Savvy Sharps Container (K140285)].